

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re: Financial Oversight & Management  
Board for Puerto Rico

*As representative of*

The Commonwealth of Puerto Rico, et al

**Debtors**

Case No.: 17 BK 3283-LTS

PROMESA Title III

(Jointly Administrated)

**Norma I. Alsina Martinez /  
Claim 116,945**

**REPLY TO THE NOTIFICATION OF THE FIFTY TWENTY-EIGHTH GLOBAL  
OBJECTION OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEE'S  
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO AND THE PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY TO ADR DEFICIENT CLAIMS**

To the Honorable Court:

**COMES NOW** Attorney César Enrique Molina Aponte, pro se, and very respectfully  
**SETS FORTH** and **PRAYS**:

1. The contact information of the undersigned attorney and through which you can contact Norma I. Alsina Martinez, claim 116,945, appears at the end of this motion.
2. We begin by stating that from the beginning, we have delivered the documentation that evidences a reliable claim. Even on September 6, 2022, as ordered, evidence was presented on these claims
3. As a matter of fact, the lawsuit in question was bifurcated and initially it was evaluated whether the plaintiffs were right in their claims and in the second part of the lawsuit, it remains to be determined how much damage the Government of Puerto Rico caused them.
4. So far, the damage hearing has not been held since the case is paralyzed by PROMESA.
5. Thus, this Illustrious Court should not rule out this claim.

6. Attached to this document are the documents that evidence the decision of the Court of First Instance, which was also confirmed by the Court of Appeals; also the evidence of documents sent on September 6, 2022.

**WHEREFORE** it is respectfully requested from this Honorable Court to grant this motion and dismiss the motion filed by the creditor.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF systems, which will send notification of such filing to the Office of the United States Trustee, and all participants of CM/EMF.

In San Juan, Puerto Rico, on the 2<sup>nd</sup> day of November 2022.

*f/ César Enrique Molina*  
**CÉSAR ENRIQUE MOLINA APONTE**  
USDC-PR-300906  
Attorney for creditor

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